

COTE, S

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JEFFREY S. VAUGHN, individually and  
on behalf of those Class Members similarly  
situated.,

Plaintiffs,

v.

LEEDS, MORELLI & BROWN, P.C.,  
LEEDS, MORELLI & BROWN, L.L.P.,  
LEEDS & MORELLI, LEEDS, MORELLI  
& BROWN, PRUDENTIAL  
SECURITIES, INC. Successor  
PRUDENTIAL FINANCIAL, INC.,  
WACHOVIA CORPORATION,  
WACHOVIA SECURITIES, LLC,  
LENARD LEEDS, STEVEN A.  
MORELL, JEFFREY K. BROWN and  
JOHN DOES, JAMES VAGNINI,  
FREDERIC DAVID OSTROVE,  
ROBERT JOHN VALLI, JR.,  
DISCRIMINATION ON WALL STREET,  
INC. and DISCRIMINATION ON WALL  
STREET MANHATTAN, INC. and JOHN  
DOES, ESQS. 1-10 and JANE DOES,  
ESQ. 1-10, a fictitious designation for  
presently unknown licensed attorneys,  
professionals and/or persons or entities.,

Defendants.

USDC SDNY
DOCUMENT
ELINICALLY FILED
DOC #:
DATE FILED: 12/29/04

04 Civ. 08391 (DC)

STIPULATION AND ORDER  
EXTENDING TIME TO ANSWER  
OR MOVE WITH RESPECT TO  
THE COMPLAINT

WHEREAS counsel for plaintiff has informed counsel for defendants  
Prudential Securities, Inc. and Prudential Financial, Inc. that plaintiff intends to file and  
serve a first amended complaint; and

WHEREAS the undersigned parties agree that the interests of economy  
and efficiency would be served by an adjournment of the time to answer or move with  
respect to the plaintiff's pleading until after service and filing of the first amended  
complaint.

WHEREAS plaintiff intends to file and service the first amended complaint on or before January 12, 2005; now, therefore,

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel that the time for defendants Prudential Securities, Inc. and Prudential Financial, Inc. to file and serve an answer to the first amended complaint is extended through February 12, 2005. This is the first extension of such defendants' time to answer or move with respect to the amended complaint.

Dated: New York, New York  
December 23, 2004

LAW OFFICE OF COSTANTINO FRAGALE

By: Costantino Fragale  
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*Attorney for Plaintiffs*

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON, LLP

So ordered.

*Jeanne Cole*  
December 29, 2004

By: Gerard E. Harper  
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-and-

LOWENSTEIN SANDLER, P.C.  
1330 Avenue of the Americas

New York, New York 10019

*Attorneys for Prudential Securities, Inc. and  
Prudential Financial, Inc.*

**SO ORDERED:**

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United States District Judge

*MVR*